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Assistant General Counsel

28 September 1949

Budget Officer

Revision of Regulation covering representative allowances

1. There is attached the memorandum issued by the Chief, Confidential Funds Branch on 13 September 1949, a copy of your memorandum of 2 September 1949 and the proposed Representation Allowance Regulation which was forwarded to this office for review.
2. It is desired to present certain comments and/or suggestions for your consideration in connection with the preparation of the final draft of the Regulation.
 - a. It is recommended that the additional sentence proposed in the second paragraph of your memorandum of 2 September 1949 relating to "errors of judgment or misunderstanding" be eliminated as a part of Paragraph 13.4. The inclusion of this sentence would not prevent any abuse which might otherwise be prevalent and in the event of an occasional situation where "relief" needs to be granted, it is believed that it could be handled on the basis of each individual case.
 - b. In the last sentence of Paragraph 13.1 applicable to "Delegation of Authority" it is suggested that the words "wherever possible" be eliminated so that the sentence will read as follows: "Authorization should be made prior to the commencement of travel or the incurrence of expense".
 - c. Under Subparagraph 13.3a, it is believed advisable that the terminology be changed so that the statement will read substantially as follows: "A supplementary quarters allowance, in a fixed amount, to be justified and/or accounted for in accordance with the procedure set forth in the Standardized Government Civilian Allowance Regulations, but in no event to exceed \$700 per year".
 - d. Under Subparagraph 13.3c, it is suggested that reference to servants and chauffeurs be eliminated so that the last sentence will read as follows: "This might include, but is not limited to, the reimbursement of the expenses of suitable gifts, flowers, wreaths, etc. for foreign officials".

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3. Subject to the above considerations, this office concurs in the proposed Regulation as written, including the recommendation made by the Chief, Confidential Funds Branch that the effective date be established as 1 January 1950 since provisions have already been made in the Director's memorandum of 7 September 1949 to provide "interpretations" of existing Regulations to cover individual cases where individuals have already been granted representative allowances.

E. R. SAUNDERS

cc: Chief, CFB ✓
KEM/dhl

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